

REMARKS

Applicant hereby traverses the outstanding objections and rejections, and requests reconsideration and withdrawal in light of the amendments and remarks contained herein. Claims 1-22 are pending in this application.

Objection to the Drawings

The drawings have been objected to under 37 C.F.R. § 1.83(a) as failing to show every feature of the invention specified in the claims. Applicant has added new FIGURE 5 to conform to Examiner's request. Support for the new figure can be found in paragraph 9, lines 22-29 of the original application. New FIGURE 5 is attached after page 11.

Amendments to the Claims

Independent claims 1, 6, 12, and 17 are currently amended, and no new matter has been added. Support for these amendments can be found on page 9, lines 1-7. Dependent claims 3, 7, 9, and 10 have been amended, and no new matter has been added.

Amendments to the Specification

Please amend page 7 such that the title reads, "BRIEF DESCRIPTION OF THE DRAWINGS." Further, please add below the description of FIGURE 4 a description of FIGURE 5: "FIGURE 5 is a flow chart describing the process of training using back-propagation."

The paragraph beginning page 9, line 22 has been amended to correspond to new FIGURE 5. No new matter has been added.

Claim Rejections under 35 U.S.C. § 103(a)-Ahmadi in view of Bennett

Claims 1-5 and 12-16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over European Patent Publication EP 1093310 to Ahmadi (hereinafter, *Ahmadi*) in view of US Patent 5,331,589 to Bennett (hereinafter, *Bennett*).

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify a reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. §2143. Without conceding any other criteria, Applicant respectfully asserts that the rejection does not satisfy the third criterion for establishing a prima facie case of obviousness.

Failure to Teach or Suggest All Claimed Elements

Amended independent claim 1 provides:
training said artificial neural network to an ADSI standard to provide a trained artificial neural network system;

On pages 2-5 of the Office Action, Examiner rejects claim 1 as obvious over a combination of *Ahmadi* and *Bennett*. To establish a prima facie case of obviousness, *inter alia*, the proposed combination must teach or suggest each and every element of the claim. The proposed combination of *Ahmadi* and *Bennett* does not teach or suggest training said artificial neural network to an ADSI (analog display services interface) standard, as claim 1 provides. The combination of *Ahmadi* and *Bennett* does not teach or suggest this element of claim 1. Therefore, Applicant respectfully asserts that at least for the above reasons claim 1 is patentable over the 35 U.S.C. § 103(a) rejection of record.

Further, amended independent claim 12 provides:
wherein the determining call progress tones conforms to an ADSI standard.

On pages 2-5 of the Office Action, Examiner rejects claim 12 as obvious over a combination of *Ahmadi* and *Bennett*. To establish a prima facie case of obviousness, *inter alia*, the proposed combination must teach or suggest each and every element of the claim. The proposed combination of *Ahmadi* and *Bennett* does not teach or suggest determining call progress tones conforms to an ADSI standard, as claim 12 provides. The combination of *Ahmadi* and *Bennett* does not teach or suggest this element of claim 12. Therefore, Applicant respectfully asserts that at least for the above reasons claim 12 is patentable over the 35 U.S.C. § 103(a) rejection of record.

Claims 2-5 and 13-16 depend directly from base claims 1 and 12 respectively, and thus inherit all limitations of their respective base claims claim 1 and 12. Each of claims 2-5 and 13-16 sets forth features and limitations not recited by the combination of *Ahmadi* and *Bennett* nor *Weser*. Thus, Applicant respectfully asserts that for at least the above reasons claims 2-5 and 13-16 are patentable over the 35 U.S.C. § 103(a) rejection of record.

Claim Rejections under 35 U.S.C. § 103(a)-*Ahmadi* in view of *Bennett* in further view of *Li*

Claims 6 and 17 are rejected as being unpatentable over a combination of *Ahmadi* and *Bennett* and US patent number 6,549,587 to *Li* (hereinafter *Li*).

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify a reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. §2143. Without conceding any other criteria, Applicant respectfully asserts that the rejection does not satisfy the third criterion for establishing a prima facie case of obviousness.

Failure to Teach or Suggest All Claimed Elements

Amended independent claim 6 provides:
training said artificial neural network system...to an ADSI standard.

On pages 5-8 of the Office Action, Examiner rejects claim 6 as obvious over a combination of *Ahmadi* and *Bennett* and US patent number 6,549,587 to *Li* (hereinafter *Li*). To establish a prima facie case of obviousness, *inter alia*, the proposed combination must teach or suggest each and every element of the claim. The proposed combination of *Ahmadi* and *Bennett* does not teach or suggest training to an ADSI (analog display services interface) standard, and Examiner does not rely on *Li* to teach this element. The combination of *Ahmadi*, *Bennett* and *Li* does not teach or suggest this element of claim 6. Therefore, Applicant respectfully asserts that at least for the above reasons claim 6 is patentable over the 35 U.S.C. § 103(a) rejection of record.

Further, amended independent claim 17 provides:
means for training said artificial neural network system to conform to an ADSI standard...

On pages 5-8 of the Office Action, Examiner rejects claim 17 as obvious over a combination of *Ahmadi* and *Bennett* and US patent number 6,549,587 to Li (hereinafter *Li*). To establish a prima facie case of obviousness, *inter alia*, the proposed combination must teach or suggest each and every element of the claim. The proposed combination of *Ahmadi* and *Bennett* does not teach or suggest training to conform to an ADSI (analog display services interface) standard, and Examiner does not rely on *Li* to teach this element. The combination of *Ahmadi*, *Bennett* and *Li* does not teach or suggest this element of claim 17. Therefore, Applicant respectfully asserts that at least for the above reasons claim 17 is patentable over the 35 U.S.C. § 103(a) rejection of record.

Claim Rejections under 35 U.S.C. § 103(a)-*Ahmadi* in view of *Bennett* in view of *Li* in further view of *Moses*.

Claims 7, 9-11, 18, and 20-22 are rejected as being unpatentable over a combination of *Ahmadi*, *Bennett*, *Li* and US patent number 5,532,950 to Moses (hereinafter *Moses*).

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify a reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. §2143. Without conceding any other criteria, Applicant respectfully asserts that the rejection does not satisfy the third criterion for establishing a prima facie case of obviousness.

Failure to Teach or Suggest All Claimed Elements

Claims 7 and 9-11 depend directly or indirectly from base claim 6, and thus inherit all limitations of base claims claim 6. Therefore, each of claims 7 and 9-11 sets forth features and limitations not recited by the combination of *Ahmadi*, *Bennett*, and *Li*. Further, Examiner does not rely on *Moses* to supply these elements. Thus, Applicant respectfully asserts that for

at least the above reasons claims 7 and 9-11 are patentable over the 35 U.S.C. § 103(a) rejection of record.

Claims 18 and 20-22 depend directly or indirectly from base claim 17, and thus inherit all limitations of base claims claim 17. Therefore, each of claims 18 and 20-22 sets forth features and limitations not recited by the combination of *Ahmadi*, *Bennett*, and *Li*. Further, Examiner does not rely on *Moses* to supply these elements. Thus, Applicant respectfully asserts that for at least the above reasons claims 18 and 20-22 are patentable over the 35 U.S.C. § 103(a) rejection of record.

Claim Rejections under 35 U.S.C. § 103(a)-*Ahmadi* in view of *Bennett* in view of *Li* in further view of *Weser*.

Claims 8 and 19 are rejected as being unpatentable over a combination of *Ahmadi*, *Bennett*, *Li* and US patent number 6,104,803 to Weser (hereinafter *Weser*).

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify a reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. §2143. Without conceding any other criteria, Applicant respectfully asserts that the rejection does not satisfy the third criterion for establishing a prima facie case of obviousness.

Failure to Teach or Suggest All Claimed Elements

Claim 8 depends directly from base claim 6, and thus inherits all limitations of base claim 6. Therefore, claim 8 sets forth features and limitations not recited by the combination of *Ahmadi*, *Bennett*, and *Li*. Further, US patent number 6,104,803 to Weser et al. (hereinafter *Weser*), which was cited by Examiner against claim 8, does not teach these features and limitations. Thus, Applicant respectfully asserts that for at least the above reasons claim 8 is patentable over the 35 U.S.C. § 103(a) rejection of record.

Claim 19 depends directly from base claim 17, and thus inherits all limitations of base claim 17. Therefore, claim 19 sets forth features and limitations not recited by the

combination of *Ahmadi, Bennett, and Li*. Further, US patent number 6,104,803 to Weser et al. (hereinafter *Weser*), which was cited by Examiner against claim 19, does not teach these features and limitations. Thus, Applicant respectfully asserts that for at least the above reasons claim 19 is patentable over the 35 U.S.C. § 103(a) rejection of record.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-2025, under Order No. 10991539-1 from which the undersigned is authorized to draw.

I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail Label EV256030675US in an envelope addressed to: MS Non-fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Date of Deposit: 12/16/2003

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Respectfully submitted,

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Attachment: Please see new FIGURE 5.